

EXHIBIT D

**THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:	Chapter 11
PGX HOLDINGS, INC., <i>et al.</i> ,	Case No. 23-10718 (CTG)
Debtors. ¹	(Jointly Administered)
KIRSTEN HANSEN on behalf of herself and all others similarly situated,	
Plaintiff,	Adv. Proc. No. 23-50396 (CTG)
v.	
PGX HOLDINGS, INC.; PROGEXION HOLDINGS, INC.; PROGEXION TELESERVICES, INC.; PROGEXION MARKETING, INC.; PROGEXION ASG, INC.; PROGEXION IP, INC.; EFOLKS, LLC; CREDITREPAIR.COM, INC.; CREDIT.COM, INC.; and JOHN C. HEATH, ATTORNEY AT LAW, PLLC,	Re: Adv. D.I. _____
Defendants.	

**ORDER GRANTING
MOTION FOR CLASS CERTIFICATION AND RELATED RELIEF**

AND NOW, upon consideration of Plaintiff's Motion for Class Certification and Related Relief, the proposed Notice to the Class, and the Court being otherwise advised in the premises, and upon finding that the proposed class meets the requirements of Fed. R. Civ. P. 23(a) and (b) and Rule 23(b)(3), as made applicable by Fed. R. Bankr. P. 7023, it is hereby,

ORDERED that the Motion is GRANTED; and it is

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: PGX Holdings, Inc. (2510); Credit Repair UK, Inc. (4798); Credit.com, Inc. (1580); Creditrepair.com Holdings, Inc. (7536); Creditrepair.com, Inc. (7680); eFolks Holdings, Inc. (5213); eFolks, LLC (5256); John C. Heath, Attorney at Law PC (8362); Progrexion ASG, Inc. (5153); Progrexion Holdings, Inc. (7123); Progrexion IP, Inc. (5179); Progrexion Marketing, Inc. (5073); and Progrexion Teleservices, Inc. (5110). The location of the Debtors' service address for purposes of these chapter 11 cases is: 257 East 200 South, Suite 1200, Salt Lake City, Utah 84111.

FURTHER ORDERED that a class is certified, defined as:

Plaintiff and other similarly situated employees of Defendants: (i) who worked at, received assignments from, or reported to the Facilities, (ii) who were terminated without cause within 90 days of April 5, 2023, or in reasonable anticipation of or as the reasonably foreseeable consequence of the mass layoffs or plant closings ordered by Defendant on or about April 5, 2023, (iii) who are “affected employees” within the meaning of 29 U.S.C. § 2101(a)(5), and (iv) who have not filed a timely request to opt-out of the class; and it is

FURTHER ORDERED that Raisner Roupinian LLP is hereby appointed Class Counsel; and it is

FURTHER ORDERED that Kirsten Hansen is hereby appointed Class Representative; and it is

FURTHER ORDERED that the proposed form of Notice to the Class submitted to the Court is approved; and it is

FURTHER ORDERED that within ten (10) days after the entry of this Order, Defendants shall provide Class Counsel with the names and addresses of the class members as noted in Defendants’ records; and it is

FURTHER ORDERED that on or before fifteen (15) business days after receipt from Defendants of the names and addresses of the Class members, Class Counsel shall provide notice of the pendency of the class action lawsuit by mailing the Notice, First Class postage prepaid, to all class members to their last known address as noted in the records of the Defendants; and it is

FURTHER ORDERED that after such mailing, Class Counsel shall serve and file a sworn statement affirming compliance with this Order concerning the mailing of the Notice; and it is

FURTHER ORDERED that the deadline for any Class Member to opt-out of the Class shall be 30 days from the date of mailing of the Notice; and it is

FURTHER ORDERED that after the opt-out deadline has expired, Class Counsel shall

serve and file a sworn statement listing the names of any persons who have opted out of the Class;
and it is

FURTHER ORDERED that Notice in compliance with this order is hereby found to be the best notice practicable under the circumstances and constitutes due and sufficient notice to all class members in full compliance with the notice requirements of Fed. R. Civ. P. 23.

AND IT IS SO ORDERED.